

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

JASON R. BECK

Debtor

Case No. 5-18-02471

Chapter 13

Robert N. Opel, II, C.B.J.

TOYOTA MOTOR CREDIT
CORPORATION

Movant

v.

JASON R. BECK

Respondent

**DEBTOR'S REPLY TO MOTION FOR RELIEF OF TOYOTA MOTOR
CREDIT CORPORATION**

AND NOW, comes the Debtor herein by and through his attorney, Brian E. Manning Esquire, and files the following Reply to the Motion for Relief and in support thereof alleges:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted, however by way of further answer, Debtor is reconsidering his decision to surrender the vehicle due to the difficulty he is facing in obtaining a different vehicle

during the pendency of this case. Debtor anticipates making a decision regarding the retention of the vehicle by the time the hearing is scheduled on the instant Motion. In the event the Debtor decides to retain the vehicle, he will file an amended Chapter 13 Plan.

6. Admitted.

7. Admitted. By way of further answer, in the event the Debtor makes the determination to retain the vehicle he will bring the post-petition payments current.

8. Admitted.

9. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

a. See response to Paragraph 5, above.

b. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

10. The request for a waiver of Bankruptcy Rule 4001(a)(3) should be denied as the Movant fails to state any grounds which would warrant the relief it is requesting.

WHEREFORE, the Debtor respectfully requests that this Court enter an order denying the Motion for Relief without prejudice and granting the Debtor such other and further relief as the Court deems just and appropriate under the circumstances.

Respectfully Submitted
Law Offices of Brian E. Manning
/s/ Brian E. Manning
Brian E. Manning, Esquire
502 S. Blakely, St., Suite B
Dunmore, PA 18512
Tel. 570-558-1126
Fax 866-559-9808
brianmanning@comcast.net
Attorney for the Debtor

Dated: August 10, 2018